

Exhibit 1

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November 7, 2018

By U.S. Mail

Department of the Treasury

FOIA Request

1500 Pennsylvania Ave., N.W.
Washington, D.C. 20220

Re: Freedom of Information Act Request

Dear FOIA Officer:

My law firm represents over 350 American veterans and civilians, and their families (including over 50 Gold Star Families), in connection with deaths and injuries caused by terrorists in Iraq. On behalf of our clients, we have filed a lawsuit against pharmaceutical and medical device companies that contracted with the Iraqi Ministry of Health, alleging that they funded terrorists who killed or wounded thousands of Americans in Iraq. As part of our investigation of these allegations, and on behalf of our clients who have made great sacrifices in connection with America's involvement with Iraq, we submit this request under the Freedom of Information Act, 5 U.S.C. §§ 552, *et seq.* ("FOIA") for copies of the records described below.

Background

In late 2005, the U.S. Treasury and Defense Departments established "a Baghdad-based interagency intelligence unit, known as the **Iraq Threat Finance Cell (ITFC)**, to enhance the collection, analysis, and dissemination of timely and relevant financial intelligence to combat the insurgency."¹ The ITFC was co-led by a CENTCOM colonel and "headquartered in Baghdad with liaison officers spread throughout Iraq."² Its mission was "the identification and degradation of financial networks used by militant groups,"³ including **Jaysh al-Mahdi**, a Shiite terrorist group led by anti-American cleric **Muqtada al-Sadr**. By 2004, Jaysh al-Mahdi used its control over the **Iraqi Ministry of Health ("MOH")** to finance its operations, including attacks on American and Coalition forces.

¹ J. Edward Conway, *Analysis in Combat: The Deployed Threat Finance Analyst*, Small Wars Journal (July 5, 2012) (available at <http://smallwarsjournal.com/jrnl/art/analysis-in-combat-the-deployed-threat-finance-analyst>).

² Id.

³ Id.



In 2004, the Treasury Department created the **Office of Terrorism and Financial Intelligence (TFI)**. The TFI encompassed the **Office of Intelligence and Analysis (OIA)**, which became “the primary human resource for Treasury’s analytical support to the ITFC.”⁴

Records Requested

From **July 1, 2005 through December 31, 2011**, all documents, communications, reports, analyses, notes, memoranda, financial data, and any other records (including drafts) generated, drafted, prepared, created, authored, reviewed, or relied upon by the **Iraq Threat Finance Cell**, or its members, representatives, or agents regarding:

- a. The **Iraqi Ministry of Health**; or
- b. **Jaysh al-Mahdi** (a/k/a Jaysh al-Mehdi, Jaish al-Mahdi, The Mehdi Army, The Mahdi Army, the Mahdi Militia, or JAM); or
- c. **Muqtada al-Sadr** (a/k/a Muqtada Sadr, or Moktada al-Sadr).

Such records include, but are not limited to, **intelligence information reports (“IIRs”)**.

Please search for responsive records regardless of format, medium, or physical characteristics. Where possible, **please produce records electronically in PDF format**. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs. Our request includes any letters, emails, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, discussions, and any attachments to such records. If any of this information is currently classified or restricted distribution, we ask that you submit the records for declassification in accordance with Executive Order 13526, and all other relevant regulations, policies and orders governing declassification of documents.

For any responsive records, or portions of records, you deem covered by any applicable FOIA exemption, 5 U.S.C. § 552(b) prescribes the appropriate process: “[a]ny reasonably segregable portion of a record shall be provided...after deletion of the portions which are exempt under this subsection. The amount of information deleted, and the exemption under which the deletion is made, shall be indicated on the released portion of the record, unless including that indication would harm an interest protected by the exemption in this subsection under which the deletion is made. If technically feasible, the amount of the information deleted, and the exemption under which the deletion is made, shall be indicated at the place in the record where such deletion is made.”

⁴ Id.

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I am willing to pay fees for this request up to a maximum of **\$200**. If the fees for this request exceed that amount, please inform me first.

Thank you for addressing this request. Do not hesitate to contact me with any questions or concerns, and please mail responsive materials to the address in the letterhead above.

Sincerely,

A handwritten signature in black ink, appearing to be "Dustin M. Lee", written over a horizontal line.

Dustin M. Lee
dustin.lee@sparacinoplac.com